

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

TZEW HOLDCO LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 20-10910 (CSS)

(Jointly Administered)

**NOTICE OF APPEARANCE AND DEMAND  
FOR NOTICES AND SERVICE OF PAPERS**

PLEASE TAKE NOTICE that the attorneys set forth below enter their appearance as counsel on behalf of California Physicians' Service dba Blue Shield of California (hereinafter "Blue Shield of California") and request that all notices given or required to be given pursuant to Bankruptcy Rules 2002 and 9007 or otherwise, including, but not limited to notices, applications, motions, petitions, orders, pleadings, complaints for demands, be given to and served upon them as follows:

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PLEASE TAKE FURTHER NOTICE that neither this Entry of Appearance nor any subsequent appearance, pleading, claim, or suit is intended to waive (i) Blue Shield of California's right to have final orders in Stern matters entered only by a district judge; (ii) Blue

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Apex Parks Group, LLC (5579); Apex Real Property Holdings, LLC (1013); Speedzone Beverage Company, LLC (2339); Speedzone Holdings, LLC (7913); Speedzone Management, LLC (2937); TZEW Holdco LLC (0252); and TZEW Intermediate Corp. (1058). The location of the Debtors' service address in these chapter 11 cases is: 18575 Jamboree Road, Suite 600, Irvine, CA 92612.

Shield of California's right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) Blue Shield of California's right to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal; (iv) any lack of venue or jurisdiction by this Court over this cause or any adversary proceeding, contested matter, or other proceeding; (v) the right to service under Bankruptcy Rule 7004 in adversary proceedings, and counsel is not appointed as its agent for service of process in any such adversary proceedings; or (vi) any other rights, claims, actions, defenses, setoffs or recoupments to which Blue Shield of California is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments Blue Shield of California expressly reserves.

Respectfully submitted,

Dated: April 17, 2020  
Wilmington, Delaware

**AUSTRIA LEGAL, LLC**

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-and-

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***Counsel for California Physicians' Service dba Blue  
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